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Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

# UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

: Chapter 11

PURDUE PHARMA L.P., et al.,

: Case No. 19-23649 (RDD)
:

Debtors.<sup>1</sup>

THIRD MONTHLY FEE STATEMENT OF GILBERT LLP, FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR THE PERIOD DECEMBER 1, 2019 THROUGH DECEMBER 31, 2019

(Jointly Administered)

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services	Ad Hoc Committee of Governmental and Other
to:	Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment</b>	December 2, 2019 (Docket #553)
of Fees and Expenses of Applicant:	
Period for which compensation and	December 1, 2019 through December 31, 2019
reimbursement is sought:	
Amount of compensation sought as actual,	\$88,959.40 (80% of \$111,199.25)
reasonable, and necessary:	
Amount of expense reimbursement sought	\$9,828.20 (100%)
as actual, reasonable and necessary:	
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals entered by this Court on December 2, 2019 [Docket #553] (the "Reimbursement Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket #529] (the "Procedures Order"), the law firm of Gilbert LLP ("Gilbert LLP"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "AHC"), hereby submits this third monthly fee statement (the "Monthly Fee Statement") for legal services rendered and reimbursement for expenses incurred for the period commencing December 1, 2019 through December 31, 2019 (the "Application Period").

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$111,199.25 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$88,959.40.

- 2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$913.66. The blended hourly rate of paraprofessionals during the Application Period is \$238.20.
- 3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$9,828.20 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$9,828.20.
- 4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.
- 5. Pursuant to the Reimbursement Order, Gilbert LLP has separately recorded services performed relating to allocation of value among the Debtors' creditors, and to the best of Gilbert LLP's knowledge, has not included time relating to intercreditor allocation in this Monthly Fee Statement.

#### **FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

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7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures

Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object

to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$88,959.40 (80% of \$111,199.25) and reimbursement of reasonable and necessary expenses incurred in the amount of \$9,828.20 (100%), for a total amount of \$98,787.60, for the Application Period.

Dated: February 5, 2020 Washington, DC

Respectfully submitted,

#### **GILBERT LLP**

/s/ Kami E. Quinn

Kami E. Quinn 1100 New York Avenue, NW 7th Floor Washington, DC 20005

Tele: 202.772.2200 Fax: 202.772.3333

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Counsel for the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants.

# Exhibit A Summary of Services by Category

## SUMMARY OF SERVICES BY PROJECT CATEGORIES

		Hours	
Project		Billed in	Fees for
Code	Project Category	Period	Period
A001	Asset Analysis & Recovery	58.5	\$48,056.00
A003	Business Operations	0.9	\$855.00
A004	Case Administration	22.7	\$5,013.50
A005	Claims Analysis	1.9	\$1,805.00
A006	Employment / Fee Applications	4.4	\$1,210.00
A007	Emergency Relief Fund	4.3	\$3,515.00
A009	Meetings / Communications with AHC & Creditors	25.4	\$29,501.00
A015	Non-Working Travel Time (Billed @ 50%)	18.3	\$11,538.75
A019	Plan of Reorganization / Disclosure Statement	10.0	\$9,705.00
		146.4	\$111,199.25

# Exhibit B Summary of Compensation by Professional

#### SUMMARY OF COMPENSATION BY PROFESSIONAL

		Hourly Billing	Hours Billed for	Total Fees
Name of Professional	Position / Year Admitted to Practice	Rate	Period	for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia - 1980 U.S. Court of International Trade - 1984	\$1,500.00 \$750.00	28.9 11.5	\$43,350.00 \$8,625.00
	U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019			
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$950.00 \$475.00	26.0 4.5	\$24,700.00 \$2,137.50
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011	\$675.00 \$337.50	11.3 2.3	\$7,627.50 \$776.25
	U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019			
Monique Abrishami	Of Counsel / State of Florida – 2009 District of Columbia - 2019	\$640.00	0.5	\$320.00
Emily Grim	Associate / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$600.00	0.2	\$120.00
Daniel Wolf	Associate / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$600.00	13.3	\$7,980.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit – 2017	\$570.00	5.1	\$2,907.00
Benjamin Massarsky	Associate / State of New York – 2011 District of Columbia – 2012 U.S. District Court for the District of Columbia – 2012 State of Maryland - 2016	\$500.00	9.4	\$4,700.00
Christian Carey	Law Clerk – Joined firm in 2019	\$325.00	4.6	\$1,495.00
Lauren Fastenau	Paralegal – Joined firm in 2019	\$300.00	1.2	\$360.00
Alyssa Bonesteel	Paralegal – Joined firm in 2018	\$225.00	2.4	\$540.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$225.00	9.5	\$2,137.50

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Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Sherley Martinez	Paralegal – Joined firm in 2017	\$225.00	1.9	\$427.50
Gabriella Foster	Project Assistant – Joined firm in 2019	\$190.00	9.4	\$1,786.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$275.00	4.4	\$1,210.00
	Totals		146.4	\$111,199.25
	Attorney Blended Rate	\$913.66		·
	Paraprofessional Blended Rate	\$238.20		·

# Exhibit C Summary of Expenses Incurred

## SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Contracted Professional Fees – Litigation Support Vendor	\$620.10
Pacer	\$33.90
Westlaw	\$82.19
Travel – Airfare (Coach Fare)	\$1,955.05
Travel – Lodging (Standard Room Rate)	\$5,320.76
Travel – Meals	\$135.88
Travel – Taxi Fare	\$18.32
Travel – Train Fare (Coach Fare)	\$1,662.00
	\$9,828.20

## Exhibit D

**Time and Expense Detail** 

**GILBERT** 

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February 5, 2020

Invoice Number: 11318805 Client Number: 1599

Tax ID: 52-2283869

Ad Hoc Committee c/o Marshall S. Huebner Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017

# FOR PROFESSIONAL SERVICES RENDERED through December 31, 2019

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy <b>Total</b>	111,199.25 <b>111,199.25</b>	9,828.20 <b>9,828.20</b>	121,027.45 <b>121,027.45</b>
	TOTA	L FEES	\$ 111,199.25
	TOTAL EXP	PENSES	\$ 9,828.20
	TOTAL FEES AND EXP	ENSES	\$ 121,027.45



# FOR PROFESSIONAL SERVICES RENDERED through December 31, 2019

#### **Purdue Bankruptcy**

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Gilbert, S.	12/02/19	Confer with S. Birnbaum and others re insurance.	.80	1,200.00
Hudson, J.	12/02/19	Confer with S. Gilbert re next steps on insurance analysis.	.20	135.00
Hudson, J.	12/02/19	Confer with S. Birnbaum, D. Gentin Stock, A. Kramer, and S. Gilbert re insurance asset.	.80	540.00
Hudson, J.	12/02/19	Review and update summary of insurance analysis in advance of call with S. Birnbaum, D. Gentin Stock, A. Kramer, and S. Gilbert re insurance asset.	.80	540.00
Massarsky, B.	12/02/19	Confer with KCIC re outstanding issues/questions with Purdue policy analysis.	.20	100.00
Gilbert, S.	12/03/19	Confer with K. Quinn re strategy.	.40	600.00
Gilbert, S.	12/06/19	Attend Sackler presentation.	8.00	12,000.00
Hudson, J.	12/08/19	Revise strategy memorandum; draft template notice letters; communicate with S. Gilbert re status.	1.80	1,215.00
Hudson, J.	12/09/19	Revise strategy memorandum and prepare for strategy meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, C. Ricarte, and S. Gilbert.	2.20	1,485.00
Gilbert, S.	12/10/19	Meet with S. Birnbaum and others re insurance.	2.00	3,000.00
Hudson, J.	12/10/19	Prepare for meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, C. Ricarte, and S. Gilbert re insurance asset.	.40	270.00
Hudson, J.	12/10/19	Meet with S. Birnbaum, D. Gentin Stock, A. Kramer, C. Ricarte, and S. Gilbert re insurance asset.	1.60	1,080.00
Gilbert, S.	12/11/19	Meet with S. Birnbaum re strategy.	1.00	1,500.00
Hudson, J.	12/12/19	Confer with A. Kramer, A. Currin, and KCIC re additional D&O policies produced by Purdue.	.20	135.00
Gilbert, S.	12/13/19	Confer with J. Uzzi.	.50	750.00
Hudson, J.	12/13/19	Confer with KCIC and B. Massarsky re policy productions.	.20	135.00
Massarsky, B.	12/13/19	Confer with KCIC and J. Hudson re status of policy review.	.20	100.00
Hudson, J.	12/14/19	Confer with KCIC and Gilbert team re updating and fleshing out analysis of Directors' and Officers' coverage and insolvency issues.	1.10	742.50

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Name	Date	Services	Hours	Amount
Carey, C.	12/14/19	Communicate with J. Hudson, D. Wolf and B. Massarsky re analyzing potential coverage and D&O policy.	.30	97.50
Hudson, J.	12/15/19	Draft template for confirmatory notice letters to insurers.	1.80	1,215.00
Carey, C.	12/15/19	Communicate with J. Hudson, D. Wolf and B. Massarsky re coverage charts priority, revision, and access to Box and Ligado.	.30	97.50
Gilbert, S.	12/16/19	Confer with D. Molton; confer with J. Uzzi.	.80	1,200.00
Hudson, J.	12/16/19	Revise letter re Bermuda arbitration.	.10	67.50
Wolf, D.	12/16/19	Review potential D&O coverage.	3.40	2,040.00
Massarsky, B.	12/16/19	Confer with KCIC and A. Currin re status of Purdue document productions.	.70	350.00
Farra, A.	12/16/19	Revise letter to Purdue re insurance arbitration.	.80	456.00
Carey, C.	12/16/19	Confer with D. Wolf re Bermuda tower insurers.	.20	65.00
Carey, C.	12/16/19	Confer with S. Martinez re claims analysis and payment.	.20	65.00
Carey, C.	12/16/19	Communicate with D. Wolf re Bermuda tower insurers.	.30	97.50
Carey, C.	12/16/19	Communicate with KCIC, D. Wolf, and B. Massarsky re project coordination and next steps.	.30	97.50
Carey, C.	12/16/19	Communicate with KCIC, D. Wolf, and B. Massarsky re coverage-chart analyses.	.60	195.00
Gilbert, S.	12/17/19	Confer re Sackler liability.	1.20	1,800.00
Gilbert, S.	12/17/19	Confer re investment banker.	1.00	1,500.00
Wolf, D.	12/17/19	Review potential D&O coverage.	2.60	1,560.00
Martinez, S.	12/17/19	Research re Bermuda towers review.	1.90	427.50
Massarsky, B.	12/17/19	Confer with D. Wolf re D&O policy analysis.	.80	400.00
Massarsky, B.	12/17/19	Confer with KCIC and A. Currin re Purdue D&O policy analysis.	.70	350.00
Massarsky, B.	12/17/19	Confer with counsel for Purdue re policies; correspond with D&O insurers.	.40	200.00
Carey, C.	12/17/19	Communicate with KCIC and team re analysis of key D&O policy provisions.	.40	130.00
Carey, C.	12/17/19	Communicate with D. Wolf and S. Martinez re Bermuda insurers.	.30	97.50
Carey, C.	12/17/19	Preliminary review of certain insurance-related documents.	1.40	455.00
Hudson, J.	12/18/19	Finalize demand for access to Bermuda arbitration.	.10	67.50
Wolf, D.	12/18/19	Research potential D&O coverage; draft memorandum re same.	2.80	1,680.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	12/22/19	Confer with K. Eckstein re strategy.	1.00	1,500.00
Wolf, D.	12/24/19	Review D&O coverage.	3.00	1,800.00
Wolf, D.	12/26/19	Continue to review potential D&O coverage; confer with M. Abrishami re same.	1.20	720.00
Abrishami, M.	12/26/19	Assess D&O policy application to claims against Purdue.	.50	320.00
Wolf, D.	12/27/19	Continue review of potential D&O coverage.	.30	180.00
Massarsky, B.	12/27/19	Analyze complaints against Purdue employees and directors re potential D&O coverage.	3.70	1,850.00
Massarsky, B.	12/30/19	Continue analyzing complaints against Purdue employees and directors.	2.70	1,350.00
Carey, C.	12/31/19	Communicate with KCIC, D. Wolf, and S. Martinez re documentation and further research re insurance coverage.	.30	97.50
		Project Total:	58.50	\$ 48,056.00

### **A003: Business Operations**

Name	Date	Services	Hours	Amount
Quinn, K.	12/19/19	Listen to hearing (partial).	.70	665.00
Quinn, K.	12/19/19	Review Kramer Levin summary of hearing.	.20	190.00
		Project Total:	.90	\$ 855.00

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Johnson, K.	12/05/19	Update databases and calendar dates re incoming pleadings.	.50	112.50
Quinn, K.	12/10/19	Review R. Ringer update.	.20	190.00
Johnson, K.	12/11/19	Organize and assemble Sackler presentation documents and videos.	.50	112.50
Johnson, K.	12/12/19	Update databases and calendar dates re incoming pleadings.	.70	157.50
Johnson, K.	12/16/19	Update databases and calendar dates re incoming pleadings.	.80	180.00
Foster, G.	12/17/19	Research cases re Sacklers and Purdue employees.	1.70	323.00
Foster, G.	12/18/19	Update tracking sheet re Sackler litigation.	3.40	646.00
Foster, G.	12/18/19	Create chart re Sackler litigation.	1.50	285.00

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Name	Date	Services	Hours	Amount
Johnson, K.	12/19/19	Update databases and calendar dates re incoming pleadings.	.70	157.50
Foster, G.	12/19/19	Update and circulate chart re Sackler litigation.	2.80	532.00
Fastenau, L.	12/19/19	Review claims against the Sackler family and note relevant information.	1.20	360.00
Johnson, K.	12/20/19	Draft spreadsheet of claims brought against defendants in opioid related litigation.	5.30	1,192.50
Johnson, K.	12/20/19	Update databases and calendar dates re incoming pleadings.	.70	157.50
Bonesteel, A.	12/20/19	Create chart of allegations against opioid defendants.	2.40	540.00
Johnson, K.	12/30/19	Update databases and calendar dates re incoming pleadings.	.30	67.50
		Project Total:	22.70	\$ 5,013.50

#### A005: Claims Analysis

Name	Date	Services	Hours	Amount
Quinn, K.	12/02/19	Review and revise draft communications with Committee re bar date motion.	.60	570.00
Quinn, K.	12/10/19	Correspond with Brown Rudnick lawyers re proof of claim issues.	.30	285.00
Quinn, K.	12/10/19	Communicate with Davis Polk re bar date discussion.	.10	95.00
Quinn, K.	12/10/19	Review materials re bar date issues.	.40	380.00
Quinn, K.	12/13/19	Confer with Debtors and others re bar date issues.	.50	475.00
		Project Total:	1.90	\$ 1,805.00

#### A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	12/03/19	Review order entered by the Court allowing Debtors to pay AHC professionals (.5); revise fee statement per order and comments from C. Gange (1.9); communicate with K. Quinn re same (.2).	2.60	715.00
Holland, P.	12/04/19	Finalize 1st monthly fee statement; communicate with C. Gange and H. Blain re filing same.	.30	82.50
Holland, P.	12/05/19	Communicate with co-counsel re first monthly fee statement.	.20	55.00

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Name	Date	Services	Hours	Amount
Holland, P.	12/12/19	Draft November fee statement (1.2); communicate with K. Quinn re same (.1).	1.30	357.50
		Project Total:	4.40	\$ 1,210.00

#### A007: Emergency Relief Fund

Name	Date	Services	Hours	Amount
Quinn, K.	12/10/19	Begin review of Florida draft emergency fund proposal.	.60	570.00
Quinn, K.	12/13/19	Participate in non-state call re ERF.	1.20	1,140.00
Farra, A.	12/13/19	Telephone call with non-state AHC members re emergency fund; review correspondence re same.	1.00	570.00
Quinn, K.	12/14/19	Review comments to ERF from AHC.	.50	475.00
Quinn, K.	12/17/19	Review A. Farra notes re non-state call concerning ERF.	.20	190.00
Farra, A.	12/17/19	Telephone call with non-state AHC members re emergency fund; correspond with K. Quinn re same.	.50	285.00
Quinn, K.	12/18/19	Correspond re ERF issues.	.30	285.00
		Project Total:	4.30	\$ 3,515.00

#### A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Farra, A.	12/03/19	Telephone call with AHC non-state members; draft notes re same.	1.00	570.00
Gilbert, S.	12/04/19	Telephone call with AHC.	1.00	1,500.00
Farra, A.	12/05/19	Telephone call with AHC; draft notes re same.	.50	285.00
Quinn, K.	12/10/19	Participate in call with AHC co-counsel re case coordination and strategy.	1.50	1,425.00
Gilbert, S.	12/12/19	Meet with Ad Hoc Committee.	7.70	11,550.00
Quinn, K.	12/12/19	Participate in meeting with client re ERF, case strategy, FTI presentation and other issues; follow up meeting with non-consenting states; confer with PEC members.	7.70	7,315.00
Quinn, K.	12/18/19	Weekly call with client re strategy re upcoming case issues, ERF, etc; follow up call with D. Molton re same.	1.70	1,615.00

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Name	Date	Services	Hours	Amount
Farra, A.	12/18/19	Telephone call with AHC; draft notes re same.	1.30	741.00
Gilbert, S.	12/23/19	Meet with J. Rice re strategy.	3.00	4,500.00
		Project Total:	25.40	\$ 29,501.00

#### A015: Non-Working Travel Time (Billed @ 50%)

Name	Date	Services	Hours	Amount
Gilbert, S.	12/06/19	Travel from New York, NY to Miami, FL after Sackler presentation.	6.50	4,875.00
Hudson, J.	12/09/19	Travel to New York City, NY for strategy meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, C. Ricarte, and S. Gilbert.	2.30	776.25
Gilbert, S.	12/12/19	Travel from New York, NY to Miami, FL after meeting with AHC.	5.00	3,750.00
Quinn, K.	12/12/19	Travel to Washington, DC from meeting with AHC.	4.50	2,137.50
		Project Total:	18.30	\$ 11,538.75

#### A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Quinn, K.	12/02/19	Review Mundipharma memorandum re compliance.	.50	475.00
Quinn, K.	12/03/19	Participate in call re diligence; follow up calls re same.	2.50	2,375.00
Quinn, K.	12/04/19	Review communications re non-disclosure agreement negotiations.	.20	190.00
Quinn, K.	12/06/19	Participate telephonically in meeting re diligence (partial).	5.00	4,750.00
Quinn, K.	12/16/19	Communicate with E. Grim re research on injunction question.	.20	190.00
Grim, E.	12/16/19	Confer with B. Massarasky re release issues.	.20	120.00
Quinn, K.	12/17/19	Review draft transaction outline.	.50	475.00
Quinn, K.	12/18/19	Confer with C. Gange re edits to settlement transaction document list.	.20	190.00
Quinn, K.	12/18/19	Provide comments to transaction outline.	.20	190.00
Gilbert, S.	12/31/19	Confer with D. Molton.	.50	750.00
		Project Total:	10.00	\$ 9,705.00
		TOTAL CHARGEABLE HOURS	146.40	
		TOTAL FEES		\$ 111,199.25

Invoice Number: 11318805

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#### **TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Gilbert, S.	11.50	750.00	8,625.00
Gilbert, S.	28.90	1,500.00	43,350.00
Quinn, K.	4.50	475.00	2,137.50
Quinn, K.	26.00	950.00	24,700.00
Holland, P.	4.40	275.00	1,210.00
Hudson, J.	2.30	337.50	776.25
Hudson, J.	11.30	675.00	7,627.50
Grim, E.	.20	600.00	120.00
Wolf, D.	13.30	600.00	7,980.00
Martinez, S.	1.90	225.00	427.50
Massarsky, B.	9.40	500.00	4,700.00
Johnson, K.	9.50	225.00	2,137.50
Abrishami, M.	.50	640.00	320.00
Bonesteel, A.	2.40	225.00	540.00
Foster, G.	9.40	190.00	1,786.00
Fastenau, L.	1.20	300.00	360.00
Farra, A.	5.10	570.00	2,907.00
Carey, C.	4.60	325.00	1,495.00
TOTALS	146.40		\$ 111,199.25

#### **TASK SUMMARY**

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	58.50	48,056.00
A003	Business Operations	.90	855.00
A004	Case Administration	22.70	5,013.50
A005	Claims Analysis	1.90	1,805.00
A006	Employment / Fee Applications	4.40	1,210.00
A007	Emergency Financing	4.30	3,515.00
A009	Meetings / Communications with AHC & Creditors	25.40	29,501.00
A015	Non-Working Travel Time (Billed @ 50%)	18.30	11,538.75
A019	Plan of Reorganization / Disclosure Statement	10.00	9,705.00

#### **EXPENSE DETAILS**

#### E106: Online Research

Date	Description	Task	Amount
12/31/19	Westlaw	E106	82.19
12/31/19	PACER	E106	33.90
	Sub-Total of Expenses:		\$ 116.09

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#### E110: Out-of-Town Travel

Date	Description	Task	Amount
9/18/19	Travel - Train Fare - Scott Gilbert / New York NY / Attend AHC Meetings / 9.18-19.19 (Coach Fare)	E110	234.00
9/19/19	Travel - Airfare - Scott Gilbert / New York NY / Attend AHC Meetings / 9.18-19.19 (Coach Fare)	E110	443.40
9/19/19	Travel - Lodging - Scott Gilbert / New York NY / Attend ACH Meetings / 9.18-19.19	E110	560.07
9/25/19	Travel - Lodging - Scott Gilbert / New York NY / Attend ACH Meetings / 09.23-26.19	E110	1,680.21
10/07/19	Travel - Train Fare - Scott Gilbert / New York NY / Attend Client Meetings / 10.06.19 (Coach Fare)	E110	315.00
10/08/19	Travel - Lodging - Scott Gilbert / New York NY / Attend Client Meetings / 10.06.19	E110	560.17
11/06/19	Travel - Train Fare - Scott Gilbert / New York NY / Attend Client Meetings / 11.06-08.19 (Coach Fare)	E110	315.00
11/08/19	Travel - Lodging - Scott Gilbert / New York NY / Attend Client Meetings / 11.06-08.19	E110	1,120.14
11/19/19	Travel - Airfare - Scott Gilbert / White Plains NY / Attend Hearing / 11.18-19.19 (Coach Fare)	E110	854.60
12/06/19	Travel - Airfare - Scott Gilbert / New York NY / Attend Sackler Meeting / 12.05-06.19 (Coach Fare)	E110	443.40
12/06/19	Travel - Train Fare - Scott Gilbert / New York NY / Attend Sackler Meeting / 12.05-06.19 (Coach Fare)	E110	215.00
12/06/19	Travel - Lodging - Scott Gilbert / New York NY / Attend Sackler Meeting / 12.05-06.19	E110	560.07
12/06/19	Travel - Meals - Scott Gilbert / New York NY / Attend Sackler Meeting / 12.05-06.19	E110	18.33
12/09/19	Travel - Train Fare - Jenna Hudson / New York NY / Attend Insurance Strategy Meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, C. Ricarte, and S. Gilbert re insurance asset / 12.9.19 (Coach Fare)	E110	268.00
12/09/19	Travel - Lodging - Jenna Hudson / New York NY / Attend Insurance Strategy Meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, and C. Ricarte re insurance asset / 12.9.19	E110	280.03
12/09/19	Travel - Taxi Fare - Jenna Hudson / New York NY / Attend Insurance Strategy Meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, and C. Ricarte re insurance asset / 12.9.19	E110	18.32
12/09/19	Travel - Meals - Jenna Hudson / New York NY / Attend Insurance Strategy Meeting with S. Birnbaum, D. Gentin Stock, A. Kramer, and C. Ricarte re insurance asset / 12.9.19	E110	19.55
12/12/19	Travel - Airfare - Scott Gilbert / New York NY / Attend AHC meetings / 12.12.19 (Coach Fare)	E110	213.65
12/12/19	Travel - Train Fare - Kami Quinn / New York, NY / Attend Client Meetings / 12/10-11/2019 (Coach Fare)	E110	315.00
12/12/19	Travel - Lodging - Kami Quinn / New York, NY / Attend Client Meetings / 12/10-11/2019	E110	560.07
12/12/19	Travel - Meals - Kami Quinn / New York, NY / Attend Client Meetings / 12/10-11/2019	E110	98.00
	Sub-Total of Expenses:		\$ 9,092.01

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\$ 121,027.45

#### **E118: Litigation Support Vendors**

Date	Description	Task	Amount
11/30/19	Contracted Professional Fees - Aldebaran Group - Case Support -	E118	620.10
	10.01.2019 - 10.31.2019		¢ coo 40
	Sub-Total of Expenses:		\$ 620.10
	TOTAL EXPENSES		\$ 9,828.20
EXPENSE SUMMARY			
	Description		Amount
	Description Travel - Airfare		<b>Amount</b> 1,955.05
	·		
	Travel - Airfare		1,955.05
	Travel - Airfare Travel - Train Fare		1,955.05 1,662.00
	Travel - Airfare Travel - Train Fare Travel - Lodging		1,955.05 1,662.00 5,320.76
	Travel - Airfare Travel - Train Fare Travel - Lodging Travel - Taxi Fare		1,955.05 1,662.00 5,320.76 18.32
	Travel - Airfare Travel - Train Fare Travel - Lodging Travel - Taxi Fare Travel - Meals		1,955.05 1,662.00 5,320.76 18.32 135.88

**TOTAL FEES AND EXPENSES**